

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004

McDONNELL CROWLEY, LLC

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*Proposed Counsel to John M. McDonnell,
Chapter 7 Trustee*

In re:

MICHAEL G. DALY,

Debtor.

Case No. 20-12285 (KCF)

Honorable Kathryn C. Ferguson

Chapter 7

Recommended Local Form:

Followed

Modified

**APPLICATION FOR RETENTION OF COUNSEL
AND CERTIFICATE OF COMPLIANCE WITH D.N.J. LBR 2014-1(a)**

1. The applicant, John M. McDonnell, is the:

Trustee: Chap. 7 Chap. 11 Chap. 13.

Debtor: Chap. 11 Chap. 13

Official Committee of _____

2. The applicant seeks to retain the following professional, McDonnell Crowley, LLC (“MC”), to serve as:

Attorney for: Trustee Debtor-in-Possession

Official Committee of _____

Accountant for: Trustee Debtor-in-possession

Official Committee of _____

Other Professional:

Realtor Appraiser Special Counsel

Auctioneer Other (specify): _____

3. The employment of the professional is necessary because the Trustee requires legal counsel to perform the required legal services during the pendency of the case.
4. The professional has been selected because of its considerable experience in the field of bankruptcy, debtor-creditor rights, and asset liquidation. The Trustee believes that MC is well qualified to represent him as counsel in this Chapter 7.
5. The professional services to be rendered are as follows:
 - a. advising the Trustee with respect to his powers and duties;
 - b. assisting in the identifying, marshalling and liquidating of the assets of the Debtor;
 - c. prosecuting any claims which may arise in connection with this Chapter 7 proceeding; and
 - d. performing such other legal services for the Trustee as may be necessary and appropriate herein.
6. The proposed arrangement for compensation is as follows:

Compensation on an hourly basis as approved by the Court upon the filing of fee applications and as more fully set forth in the Certification of Professional in Support of Application for Retention of Professional filed simultaneously herewith.
7. To the best of the applicant's knowledge, the professional's connection with the debtor, creditors, any other party in interest, their respective attorneys and

accountants, the United States Trustee, or any person employed in the Office of the United States Trustee, is as follows:

None

Describe connection:

John M. McDonnell, Esq., a Chapter 7 Panel Trustee, is a partner in McDonnell Crowley.

8. To the best of the applicant's knowledge, the professional (check all that apply):

does not hold an adverse interest to the estate.

does not represent an adverse interest to the estate.

is a disinterested person under 11 U.S.C. § 101(14).

does not represent or hold any interest adverse to the debtors or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

Other; explain: MC was counsel for the original chapter 7 trustee who recently passed away and seeks to be retained by the successor chapter 7 trustee on the same terms and conditions as MC was previously retained and have its retention deemed effective *nunc pro tunc* to the original retention. MC is currently owed fees and expenses for its previous representation of the original chapter 7 trustee.

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows:

Wherefore, the applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may hereafter determine and allow.

Dated: July 31, 2022

/s/ John M. McDonnell
Signature of Applicant

John M. McDonnell, Chapter 7 Trustee
Name of Applicant

- and -

McDonnell Crowley, LLC
Proposed Counsel to Chapter 7 Trustee

By: /s/ Brian T. Crowley
Brian T. Crowley

CERTIFICATE OF COMPLIANCE WITH D.N.J. LBR 2014-1(a)

I have complied with D.N.J. LBR 2014-1(a) by mailing a copy of this application to all the following who did not receive electronic notice from the Court: the United States Trustee, the Debtors and/or Debtors' attorney, the Trustee (as applicable), the secured creditors, the Official Committees (as applicable), and others requesting notice, all of whose addresses are shown on the attached service list, by regular mail, postage prepaid, within one (1) day after filing with the Court.

Dated: July 31, 2022

Signed */s/ Brian T. Crowley*
Brian T. Crowley